

FILED

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEC 06 2016
12-6-14
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

PINK ZEBRA MUSIC, LLC,)	
)	
Plaintiff,)	Case No.:
)	
v.)	Judge:
)	
SHENZHEN WONDERSHARE)	
INFORMATION TECHNOLOGY CO. LTD.,)	1:16-cv-11099
WONDERSHARE SOFTWARE CO.,)	Judge Joan B. Gottschall
ISKYSOFT STUDIO, and AIMERSOFT)	Magistrate Judge Sheila M. Finnegan
STUDIO,)	
Defendants.)	

**PLAINTIFF PINKZEBRA MUSIC, LLC'S *EX PARTE* MOTION FOR ENTRY OF A
TEMPORARY RESTRAINING ORDER, INCLUDING A TEMPORARY INJUNCTION,
A TEMPORARY ASSET RESTRAINT, EXPEDITED DISCOVERY, AND SERVICE OF
PROCESS BY E-MAIL**

Plaintiff PINKZEBRA MUSIC, LLC ("Pink Zebra") seeks entry of an *ex parte* temporary restraining order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale and sale of its software incorporating Pink Zebra's copyrighted music tracks, a temporary asset restraint, expedited discovery, and service of process by email in an action arising under the Copyright Act and Illinois common law. Defendants' unauthorized and unlicensed use of Pink Zebra's copyrighted music tracks has and continues to irreparably harm Pink Zebra through lack of quality control, damage to Pink Zebra's reputation, loss of exclusivity, marketing damages, loss of control over the integrity of its work, and loss of future sales. A Memorandum of Law is filed concurrently with this Motion.

Dated: December 5, 2016

RESPECTFULLY SUBMITTED,

By: /s/ Brian T. Noack

Brian Noack

Adam Wolek

WOLEK & NOACK

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Counsel for PINKZEBRA MUSIC, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that, on December 5, 2016, he caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to counsel of record for each party.

Dated: December 5, 2016

WOLEK & NOACK

By: /s/ Brian T. Noack
Brian T. Noack